

EXHIBIT B

THE CITY OF REVERE, MASSACHUSETTS



281 Broadway
Revere, MA 02151

OFFICE OF THE CITY SOLICITOR

Paul Capizzi
Walter H. Porr, Jr.
(781) 286-8166
(781) 286-8205 (FAX)

Thomas G. Ambrosino
Mayor

June 28, 2006

VIA FACSIMILE ONLY - 617-227-9231

James S. Dilday, Esq.
Grayer & Dilday, LLP
27 School Street, Suite 400
Boston, MA 02108

Re: Pechner-James, et al., v. City of Revere, et al.

Dear Attorney Dilday:

Yesterday, after the status conference hearing before Judge Sorokin, I approached you about Docket No. 214, your opposition to the City Defendants' Sixth Status Report. I asked you to withdraw that pleading as it contained many factual errors, particularly on pages 3 and following, as it relates to the content of Judge Sorokin's Discovery Order of May 22, 2006 (Docket No. 199) and my questioning of Terri Pechner-James at her deposition on June 22, 2006. You informed me that the pleading had been prepared by your Associate in your absence and had been based upon representations made to your Associate by Ms. James. I informed you that if the pleading was not withdrawn, I would respond to it and seek sanctions pursuant to Federal Rule of Civil Procedure, Rule 11, for being required to do so. I also informed you that I would be faxing a letter to you this morning to memorialize our conversation in court. You told me that upon receipt of my letter you would give me a call. With the exception of a meeting from 2:00 – 3:00 p.m., I will be in the office all day.

I await your response.

Sincerely,


Walter H. Porr, Jr.
Assistant City Solicitor

cc: Michael Akerson, Esq., via fax 508-754-7220

***** -COMM. JOURNAL- ***** DATE JUN-28-2006 ***** TIME 08:55 *****

MODE = MEMORY TRANSMISSION

START=JUN-28 08:55

END=JUN-28 08:55

FILE NO.=374

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-REVERE SOLICITOR OFFICE -

***** UF-9000 ***** -

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781 286 8205- *****

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***** -COMM. JOURNAL- ***** DATE JUN-28-2006 ***** TIME 08:52 *****

MODE = MEMORY TRANSMISSION

START=JUN-28 08:51

END=JUN-28 08:52

FILE NO.=373

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***** UF-9000 ***** -

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